

DCUSA DCP 103 Consultation Responses – Collated Comments

Question One	Do you understand the intent of DCP 103 and are you supportive of its principles? Provide supporting comments.
British Gas	We understand the intent of DCP 103 and are supportive of it's principles. Suppliers should be able to use HH elective settlement without being penalised by non cost reflective Duos charges. This change seeks to ensure that customers who used to be settled on a NHH basis continue to receive cost reflective Duos charges once the Supplier migrates them to HH settlement.
EDF Energy	We understand the intent of the CP and support its principles whilst an enduring solution would be preferable we can understand the need for an interim solution.
Electricity North West Limited	<p>Yes we understand the intent.</p> <p>However we are not supportive of its principles. This will cause concern to those customers who, by choice, are already on Measurement Class E (elective HH). We have circa 159 of these customers (2798 nationally) on this Measurement Class with a variety of capacities ranging from 20KVA to 90KVA. The only option for these customers is to move to Measurement Class C. This may also result in additional costs to suppliers and for those that don't migrate potentially additional Use of System charges.</p> <p>Profile Class 5-8 are maximum demand customers. These customers have a connection agreement in place which includes a maximum capacity. This information is used in network management. By having all Profile Classes in one Measurement Class we cannot differentiate which customers need such a calculation without having to calculate each and every bill including those of domestic customers. Albeit this will be undertaken by the billing system, the business user will still need to identify them to check whether they comply with their agreements and whether there are potentially any network problems where excess capacity is being utilised without permission.</p>

	We are limited by a volume constraint and impacted by manual workarounds that increase the costs of service for a solution that is accepted by the industry as being one that will not become an enduring solution.
Northern Powergrid	Yes we understand the intent of the changes, however do not believe a quick fix to address this in the short term is the most effective way of delivering this change. We believe the industry should be looking at more holistic proposals that can be future proofed to provide a more robust longer term solution that aligns better with the smart meter roll-out programme.
Npower	Yes. We do understand the intent of DCP103 and are generally supportive of its principles. It provides a relatively straightforward way of ensuring that customers who were previously non-half hourly metered but are now fitted with AMR/Smart meters can transfer into half hourly settlements but be charged the equivalent non-half hourly tariff via new LLFCs.
SP Distribution & SP Manweb	<p>We understand the intent of DCP103. Whilst supportive of the longer term objectives we do not believe the proposals take into account the feasibility of implementing the proposals within the timeframe proposed and the resulting significant impacts.</p> <p>We have stated previously that we consider DCP 103 cuts across other more measured approaches to the required market changes. It is our opinion that this proposal should have been addressed in a more co-ordinated manner, rather than on the 'quick-fix' short-term basis proposed here.</p>
Scottish Power Energy Retail	With BSC modification P272 looking at mandating HH Settlement for Profile Class 5-8 customers and the requirement to review the DUoS pricing structure as a result, this change provides a good starting point to support this move within the market. Further work is still to be done to look at Profile Classes 1-4 but in principal DCP103 should support this BSC development also. Furthermore, we would be supportive of the principles of DCP103 and agree that supplier choice is fundamental (due to differing stages of SMART implementation) however there are reservations around the intended timing of implementation.
SSE Energy Supply	We understand the intent of the Change Proposal, but we do not agree with the proposed solution.

SSE Power Distribution	We understand the intent of DCP103. We are not however supportive of its principles as it seeks to introduce heavily flawed and very limited interim arrangements, ahead of development of an enduring, fit-for-purpose, industry solution.
The Electricity Network Company Limited	We understand the intent of DCP 103 and we are supportive of its principals in reflecting a more appropriate tariff for HH customers within profile classes 1 – 8.
Western Power Distribution	We do understand the intent of DCP103 but we feel it has unforeseen consequences that are potentially detrimental. We are disappointed that DCP103 does not address the issue in a sustainable way, seeking instead to get something in quickly at any cost and causing the industry to have to go through this process again from scratch in order to address the issue long term, it seems to be quite a waste of resources.
Question Two	Provide comments on the Working Group's proposed option for the progression of this. Please include within your comments whether you feel that this option adequately meets the intent of DCP 103, and if there are any details that you consider require further consideration by the Working Group.
British Gas	The working groups option is the most appropriate given the intent of the CP. The purpose of the CP is to provide a solution that can be delivered by April 2012. Working through the options put forward it was felt that this is the only realistic option that can be delivered in these timescales.
EDF Energy	The proposed option is the most pragmatic way of introducing the NHH DUoS tariffs for HH Measurement class E customers in order to meet the April 2012 implementation date.
Electricity North West Limited	The intent in the change proposal is clear that it impacts PC1-8 customers. What is unclear as to whether this is all PC1-8 customers or just PC1-8 demand customers. NHH UMS is definitely out of scope because this is to gain intelligence where HH metering has been installed. The only question is whether this should include NHH Export MPANs. In our opinion this should be excluded.
Northern Powergrid	This option does meet the intent of the change as drafted, but does not align with other industry developments such as BSCP 272 and the work being undertaken by the MIG to address the calculation of CDCM tariffs. Other options were debated which would address some of the concerns around site-specific billing, but could not be developed in time to meet the proposed

	implementation date, thereby not meeting the intent as drafted.
Npower	<p>We recognise that the proposed timescales for this modification are very tight (1 April 12). This was the simplest option that adequately met the intent since it does not involve changes to current industry data flows and uses mainly existing processes to deliver the solution.</p> <p>To provide a consistent approach, the working group should also produce a guide on how this solution will work in practice e.g. covering key steps such as DNO setting up new LLFs for elective half hourly, DNO allocates LLFC, supplier undergoing CoMC changing MC to E, appoints HHMOP/ HHDC / HHDA, etc. It is also worthwhile to document the process that the DNO will use to monitor supplier allocations, and, in particular, what happens if a supplier exceeds their allocation.</p>
SP Distribution & SP Manweb	<p>We do not agree that the working group's proposed option fulfils the intent of DCP 103. We have previously stated in the Request for Information (RFI) our belief that this option was only chosen by the working group as the best enduring solution identified could not be delivered within the required timescales. That said, we are likewise concerned as to the viability that this can be timeously delivered and furthermore consider that it does not meet the intended General Objectives of the DCUSA, particularly Item 3.</p> <p>Our response to the previous RFI stated:</p> <p><i>"The proposal seeks to reclassify all Smart Meter customers to a category (Measurement Class E) immediately recognised within the proposal as not suitable for this customer base. It then seeks to change the details behind MC E to "make it fit". This causes significant problems relating to re-assignment of existing Domestic Tariffs across to the MC E to fill the "gap" identified. We believe that it is not proven that Option 1 can be more easily delivered than Option 4, which the Working Group have stated they feel is the best enduring solution.</i></p> <p><i>The present CDCM DUoS Settlement arrangements for MC E require site-specific DUoS billing and we do not believe that this meets the criteria of "efficient discharge of DNO Licence Obligations" when applied to high-volume Domestic Customer bases.</i></p>

	<p><i>We do not consider that the potential production and validation of individual DUoS Bills for potentially millions of Domestic Customers is in the interest of Suppliers and/or Distributors, and would not support this from our DNO perspective.</i></p> <p><i>Furthermore, should the preferred Option 4 solution be approved, the introduction of a new Measurement Class allows proper consideration and categorisation of the new Smart Metering category, while allowing correct matching to existing and new tariffs. This would also facilitate any review of the DUoS issues to be addressed, perhaps by allowing continuance of DUoS Billing via the efficient Supercustomer Methodology, albeit with fully accurate readings replacing the previous inaccurate profiling as happens presently. This would involve Suppliers ensuring their Agents (Data Collectors and Data Aggregators) gather the accurate readings for submission within the D0030 Flows."</i></p>
<p>Scottish Retail</p> <p>Power</p> <p>Energy</p>	<p>Progression seems premature given that DNO's and IDNO's have indicated concerns around capacity and have also indicated that thresholds will be applied to Suppliers whose customers wish to elect HH. This will discriminate against groups of customers (not able to change to HH) and lead to potential complaints and disputes from customers. Those suppliers who are SMART ready will be disproportionately disadvantaged by restrictions imposed upon them due to DNO capacity problems. It wasn't clear if the suggested "market share" related to Smart "market share" or general "market share", at a national level or per DNO area or GSP Group.</p> <p>It would make more sense to wait until all DNO systems are ready to cope with the change so that all customers are offered the same benefits</p> <p>The original Option 4 offered the best solution and we feel it would be preferable to wait. It is not clear how customers will benefit from early implementation of Option 1 which is a change that can't be fully implemented (due to capacity restrictions) by all. Will not benefit all customers equally.</p> <p>The option suggests that sites moving to HH settlement will be held under Measurement Class E and still be related to a NHH Profile Class. At the moment Industry systems will hold a site has either NHH or HH so there needs to be clarity on how this technique will work in practice for both communications and storage of data.</p>

	<p>It would be good for the group to consider the existing Change of Measurement Class process and if there is anything that can be done through this DCP to streamline the process and make the transition to HH Settlement as smooth as possible.</p> <p>Further, DCP103 mentions the requirement for new LLFCs to support the change but seems to have ignored the impact on MTCs. As the NHH MTCs are linked to the valid combinations in MDD all new MTCs would have to be created to support this change.</p>
SSE Energy Supply	We still believe that Option 4 (as per the RFI) is a better solution.
SSE Power Distribution	We continue to hold the view expressed at the RFI stage that we do not believe that the proposal meets the intent as it is not an efficient solution. We strongly support development of a more managed enduring solution rather than implementation of an interim solution with limited capacity, patchy application across distributors and potential competition issues. It is not clear how billing capacity is communicated to suppliers, kept updated or what happens when billing capacity is exhausted.
The Electricity Network Company Limited	<i>Whilst we agree with the broader terms of DCP 103 we do not agree with the specification of creating new LLFCs in MDD specifically for differentiating them from the current NHH-settled profile class 1-8 tariffs. We use a different (internal) tariff code to describe the applicable tariff and, going forward, we would set up new (internal) tariff codes for sub 100kW HH customers.</i>
Western Power Distribution	We feel that this does meet the requirements of DCP103, but we are disappointed that DCP103 does not address the issue in a sustainable way.
Question Three	Do you believe that the intent of DCP 103 is adequately met by the proposed legal text (Appendix A), or that there are alternative ways of meeting the intent of DCP 103?
British Gas	Again given the required delivery timescales we agree that this is the only viable solution that can be delivered. There are alternative ways of providing costs reflective Duos charges for HH settled sub 100kw customers but we do not believe they can be delivered by April 2012.
EDF Energy	We agree that the legal text meets the intent of DCP103.
Electricity North West	An alternative proposal has been submitted by us that allow the industry to settle as they do now in the NHH market while they use the HH data to bill the end customer

Limited	on whatever time of day tariffs they deem appropriate until the enduring solution is developed. This would mean that this CP is not required.
Northern Powergrid	The legal text addresses the proposed change.
Npower	The general process is covered by the legal text red-lined changes. However, many of the details around new procedures need to be expanded. E.g. the legal text does not cover the issues around allocation of numbers of mpans by suppliers, DNO capacity, the process applied if a supplier exceeds their application. A number of issues have already been raised by ENW which relate to the legal text. It may be worthwhile agreeing the legal text in the Working Group.
SP Distribution & SP Manweb	As stated in our response to the previous question, we do not believe the intent of DCP103 is adequately met by the proposals.
Scottish Power Energy Retail	We believe DCP103 does not cover all issues surrounding trading NHH sites in the HH market and as such will not comment on the legal text until our comments are addressed.
SSE Energy Supply	We reject the proposed solution.
SSE Power Distribution	No - we are not clear on how the allocation of available "billing space" to DCUSA supplier parties and application of thresholds by reference to existing market share on a particular date is to be covered, as the proposed legal text does not extend to cover DNO obligations in this area. We question if it is legally appropriate in any event to base a proposal around the setting of thresholds of this nature, as this is essentially interfering with competitive market activity. This is not a principle which applies to our knowledge in any other aspect of the electricity market arrangements.
The Electricity Network Company Limited	<i>Yes DCP 103 meets the requirements of Appendix A.</i>
Western Power Distribution	We believe the proposed legal text is adequate, though note 8 under Table 5 should probably read: Note 8: Table 4 includes HH metered demand tariffs that are registered as measurement class E. Table 5 includes HH metered demand tariffs that are registered

			as measurement class C.
Question Four			Provide comments on the proposed legal text, and please detail any areas within the DCUSA that you consider may require further consideration or amendments.
British Gas			We have reviewed the legal text and have made some suggested changes which are included in Appendix A.
EDF Energy			N/A
Electricity Limited	North	West	<ol style="list-style-type: none"> Schedule 16 para 3 – the reference to the model number will change together with its release date since there is a change to the model. The release date will be interesting. This should be the implementation date so that we can use in anger the model to produce the finals. If we don't and we say 1st April 2012 then we should not be using the model to produce the final prices and as such the 1st April 2012 prices would not reflect the change proposal. Para 12 – this table infers that HH settled data will have capacity and reactive values. We need to make a note somewhere to counteract this. Para 74, 75, 80 onwards – Allocation of network costs to standing charges (fixed and capacity) – We now understand why the original draft produced by UK Power Networks included the following: “When modelling all of the components of this methodology the DNO Party shall model half hourly settled domestic users and half hourly settled SME users as if they were non-half-hourly metered Domestic Two Rate users and Small Non-Domestic Two Rate tariff users respectively.” Albeit the reference is only specific to PC1-4 and needs widening to cover off PC1-8 it ensures that further changes in this section are not required to the identified paragraphs. We do need to consider all three definitions proposed by them as well. Para 140 – Elective HH Metered Demand – defined term. Add to glossary of terms at the bottom of the schedule. Para 141 – this should read the same as ‘Elective HH Metered Demand’ rather than ‘Elective HH metered’. Para 141 – delete reference to ‘maximum demand’. This term is not used in the

	<p>HH tariff arrangements so such a term should not be used here.</p> <p>7. Para 143 – this does not reflect the discussions in the last working group. It was made clear that the DNO would select the time band for night and day and reflect such in the LC14 statement. This should be replaced with the same clause covered under para 137 and repeated here, although we probably need to be specific in that it will be a two rate time band. Consideration to a clause similar to Para 134 may be required.</p> <p>8. Para 139 and para 140 need to be repeated (as new para 144 and 145) after the new para 143 for completeness. If not it is not clear what will apply for MC E customers since they were excluded from the section above.</p> <p>9. Para 142 – ‘Elective HH demand’ should read ‘Elective HH Metered Demand’.</p> <p>10. Para 144 – table 4 – we have ‘metered demand’ and ‘Metered Demand’. Be consistent.</p> <p>11. Para 144 – table 4 – I do not believe we would be offering a unrestricted HH tariff (equivalent PC1 and 3). A two rate band tariff is more cost reflective and is closer to the reasoning for suppliers to be able to offer more specific ToD tariffs to its customers.</p> <p>12. Para 144 – table 4 – likewise we do not believe that we should be offering a specific HH tariff for off peak only related MPANs.</p> <p>13. Para 144 – table 4 & note 6 – the current drafting of DCUSA states that new customers should be measured HH. HH under the current drafting means three time bands, capacity and reactive charges. Since both tables will cover off HH customers (either MC C or E) we should make it clear that new customers should be using table 5.</p> <p>14. Para 144 – table 4 – The table reference to ‘O’ for the HV point of connection should be removed. The rationale for staying NHH is the costs of installing HH CoP5 metering equipment. By the very nature of the fact that a meter change needs to take place to cater for DCP103 (i.e. HH metered) should mean that they have therefore agreed to such a metering change and they should then be treated the same as any other HV customer. There may be a need to make this clear by amending note 5 or adding a further note.</p> <p>15. Para 144 – note 8 – ‘measurement class’ should be ‘Measurement Class’</p>
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	<p>16. Measurement Class – this needs adding to the glossary of terms within the schedule.</p> <p>17. Para 148 – Observations – this infers a charge for reactive units yet table 6 states otherwise.</p> <p>18. Para 150 – see numbers 11 and 12 above.</p> <p>19. Para 150 – table 8 – the use on N/A makes this table now look odd since these would be on PC=0.</p> <p>20. Para 150 – table 9 – see numbers 11 and 12 above.</p> <p>21. Para 150 – table 9 – see number 19.</p> <p>22. General – there are no clauses associated with the volume constraints that DNOs have in this area. Some who cannot offer any volumes can seek a derogation but those who can support but have a volume constraint need to have some protection from over usage.</p> <p>23. General – we need to also add a clause covering off the method of percentage allocation to each supplier once this has been agreed.</p>
Northern Powergrid	None identified
NPower	N/A
SP Distribution/SP Manweb	The legal drafting appears to deliver the change as proposed.
Scottish Power Energy Retail	See comments above (previous question)
SSE Energy Supply	N/A
SSE Power Distribution	See above comment.
The Electricity Network Company Limited	<i>No further comment.</i>
Western Power Distribution	We are happy with the legal text.
Question Five	Do you consider that DCP 103 better facilitates the DCUSA General and CDCM Objectives? Please provide supporting comments.

British Gas	<p>General Objectives:</p> <p>2. The implementation of this change will enable suppliers to use measurement class E and secure settlement benefits if customers consumption behaviours change. These benefits will be passed on to customers through the competitive electricity supply market.</p> <p>3. The implementation of this change will enable distribution businesses to meet their Licence condition 13 Charging Methodologies for Use of System Connection clause 13.3 The relevant Objectives b and c.</p> <p>CDCM Objectives</p> <p>1. The implementation of this change will enable distribution businesses to meet their Licence condition 13 Charging Methodologies for Use of System Connection clause 13.3 The relevant Objectives b and c.</p> <p>2. The implementation of this change will enable suppliers to use measurement class E and secure settlement benefits if customers consumption behaviours change. These benefits will be passed on to customers through the competitive electricity supply market.</p> <p>3. The implementation of this charge will ensure distribution businesses provide cost reflective charges to sub 100 kw customers that are settled on a HH basis.</p>
EDF Energy	<p>DCP103 better facilitates the DCUSA general objectives and CDCM objectives 2 in that enabling NHH customers with smart metering to move to measurement class E and retain the same DUoS charges does not distort competition.</p>
Electricity North West Limited	<p>DCUSA General Objectives</p> <ol style="list-style-type: none"> 1. The development, maintenance and operation by each of the DNO Parties and IDNO Parties of an efficient, co-ordinated, and economical Distribution System. 2. The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent with that) the promotion of such competition in the sale, distribution and purchase of electricity.

	<p>3. The efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences.</p> <p>4. The promotion of efficiency in the implementation and administration of this Agreement and the arrangements under it.</p> <p>This will be a detriment to objective 1 in that we will need to put in additional resources to review the capacity of all measurement Class E customers since the workaround to be applied would mean that the system would calculate all capacities inclusive of domestic customers in order to find those on PC 5-8. This would mean that we have inefficient processes to deal with what is in effect no change to the tariffs.</p> <p>Objective two is not improved. It does not promote competition. It may well frustrate it by minimising volumes, not being able to potentially have available such arrangements in some distributor regions, some suppliers having an allocation they may not use, and others not have sufficient available to them. This is a constraint on competition.</p> <p>Objective three is neutral.</p> <p>Objective four is not applicable.</p> <p>CDCM Objectives</p> <p>1. that compliance by each DNO Party with the Charging Methodologies facilitates the discharge by the DNO Party of the obligations imposed on it under the Act and by its Distribution Licence;</p> <p>2. that compliance by each DNO Party with the Charging Methodologies facilitates</p>
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	<p>competition in the generation and supply of electricity and will not restrict, distort, or prevent competition in the transmission or distribution of electricity or in participation in the operation of an Interconnector (as defined in the Distribution Licences);</p> <p>3. that compliance by each DNO Party with the Charging Methodologies results in charges which, so far as is reasonably practicable after taking account of implementation costs, reflect the costs incurred, or reasonably expected to be incurred, by the DNO Party in its Distribution Business; and</p> <p>4. that, so far as is consistent with Clauses 3.2.1 to 3.2.3, the Charging Methodologies, so far as is reasonably practicable, properly take account of developments in each DNO Party's Distribution Business.</p> <p>Objective 1 is not better facilitated in that there is likely to be derogation requests or limited and varying ability by distributors to meet certain aspects of this objective due to the short implementation date and the fact that it is seen by the industry as a quick fix and not likely to be the enduring solution.</p> <p>Objective 2 is not better facilitated since it is likely to cause suppliers some discomfort in only being able to offer certain tariffs in limited volumes throughout the country.</p> <p>Objective 3 is not better facilitated since additional costs are incurred to meet this requirement (which actually is no change to tariff prices) that the current process does not.</p> <p>Objective 4 is neutral.</p>
Northern Powergrid	The proposal to allocate spare capacity by market share could be seen as discriminatory and without knowing the volumes it may not be possible to assess if

	the chosen approach could be implemented in a fair manner.
Npower	<p>DCP103 better facilitates the DCUSA General Objective [2]:</p> <p><i>The facilitation of effective competition in the generation and supply of electricity and (so far as is consistent therewith) the promotion of such competition in the sale, distribution and purchase of electricity</i></p> <p>Currently, DUoS tariffs are generally a disincentive for customers with AMR/Smart metering settling half hourly.</p>
SP Distribution/SP Manweb	<p>We do not believe the intent of DCP103 better facilitates DCUSA General Objective 3</p> <p><i>"the efficient discharge by each of the DNO Parties and IDNO Parties of the obligations imposed upon them by their Distribution Licences"</i></p>
Scottish Power Energy Retail	See comments above (previous question)
SSE Energy Supply	No. Existing HH Methodology in the CDCM is built around Red, Amber, Green Units. Current NHH Tariffs are not applied on a Red, Amber, Green basis, therefore DCP103 is not in-line with CDCM.
SSE Power Distribution	No. We do not believe that the DCUSA objectives based on efficiency of administration arrangements or facilitation of effective competition are properly reflected in this Change Proposal. The use of thresholds across Suppliers also contradicts the Charging Objective which states that DNOs should not restrict, distort or prevent competition.
The Electricity Network Company Limited	<i>A consumer with a particular energy usage profile should not be discriminated against in use of system charge because of the method of energy trading (HH or NHH).</i>
Western Power Distribution	We consider that DCP103 better facilitates the DCUSA General and CDCM Objectives compared to their current state, however as stated previously we do not believe it is the best solution.

Question Six	Do you agree with the proposed implementation date? If you are directly affected by the implementation of DCP 103, what system changes will be required? Please include within your comments the costs and timelines of any system changes.
British Gas	We agree with the proposed implementation date.
EDF Energy	The implementation date appears reasonable considering the low impact of the change. No systems changes would be required; however there will be an additional workload whilst the new tariffs are set up in the validation system. It is worth noting that if the volumes are significantly large, we will need to consider the impact on IT hardware.
Electricity North West Limited	<p>We agree that the implementation date needs to be prior to, with sufficient time to produce, the final prices for April 2012.</p> <p>We have indicated earlier that we could double the number of HH sites. The outcome of P272 will be the trigger for any further updates of the HH tables or a move by the industry to increase the volumes significantly.</p> <p>There will be some IT impact but this will be assessed once we have the opportunity to test the various processes that this change impacts.</p>
Northern Powergrid	No. We feel that more analysis needs to be provided to assess the true impact and spare capacity of existing billing systems in order to carry out a more meaningful cost benefit analysis. We feel April 2013 would be a more realistic date, and would allow other factors to be taken into account.
Npower	Timescales for this are very tight but given the fact that it uses current data flows and defined Industry Processes (e.g. CoMC), it should be feasible for 1 April 12. Any additional costs for npower are expected to be staffing costs only.
SP Distribution/SP Manweb	<p>We do not agree with the proposed implementation date.</p> <p>Our current DUoS Billing System has been designed to accommodate the present volumes of HH Settled MPANs (MC C and E). This can be expanded to meet P272 requirements relating to Profile Classes 5-8. However, a full review of system</p>

	<p>capability would be required to assess its capacity to accommodate any additional volumes over and above those required by P272.</p> <p>We consider the implementation of DCP 103 would result in significant FTE and other system development implications. Unless there is recognition that DUoS can continue to be settled via the Supercustomer Methodology (albeit with Suppliers Agents using the more accurate Smart Metering Data) the site-specific DUoS volumes will grow by factors of up to 300 times current volumes of readings, bills, validations and payments.</p> <p>It is important to note that DUoS billing will not be the only system impacted. MPRS will also have to handle the move from NHH to HH. An example of this is the customer MPAN, which will have to record a change in Profile Class, LLFC and MTC.</p> <p>In addition, we believe a new CDCM model would need to be created to incorporate the suggested changes, with a full impact assessment undertaken to analysis the effect on the existing CDCM tariffs. This is unlikely to be completed within the timescales of the proposed implementation date.</p>
Scottish Power Energy Retail	<p>No. Given the level of change associated with this change additional time needs to be factored in. Consideration also needs to be given to the proposed implementation dates for P272 to ensure, where possible, changes are made in conjunction with one another.</p> <p>Significant changes would be required to all Supplier and Agent systems where metering and consumption data is processed. It is too early to assess the cost associated with these changes given the early stages of the proposal and the fact that the costs associated with P272 have still not been finalised. In terms of timelines we would be expecting an implementation date close to Feb 2013 as this would give adequate time for development and allow time for the process to settle in for before P272 became active (April 2014).</p> <p>Also, see previous reasons mentioned above in relation to DNO lack of readiness and</p>

	<p>impact on customer. Whatever date is agreed, we would expect it to tie in with a DUoS release (i.e. October or April).</p>
SSE Energy Supply	We cannot meet the implementation date of April 2012.
SSE Power Distribution	<p>We continue to hold the view expressed previously stated at the RFI stage that we do not agree with the proposed implementation date, as the issues should be dealt with through an enduring solution which is not limited by billing capacity or based on allocation of thresholds to suppliers. This Proposal is seeking to rush through an inadequate interim solution before robust systems are in place to properly support the requirement.</p> <p>The questions relating to system changes, costs and timelines require further consideration, beyond the deadline for this consultation.</p>
The Electricity Network Company Limited	<i>No. February 2012 is not leaving ENC a large amount of time to get all systems up to date in this time. We would prefer a more realistic date of 1st May 2012.</i>
Western Power Distribution	We do agree with the implementation date, we have no system changes required other than setting up new LLFCs in MDD and new tariffs in our billing system.
Question Seven	<p>The Working Group previously sought DNO feedback on spare capacity that is currently available in their billing systems for NHH customers to move to elective HH. As there is a finite amount of space available there will have to be a threshold placed on the amount of Customers who can transfer on to the elective HH market. Respondents are asked to consider the following questions:</p> <p>1. The Working Group reviewed the RFI responses and agreed that the fairest way to allocate this available space would be by current market share, whilst reserving an agreed amount for new entrants to the market. Provide comments on whether you agree that this is</p>

	<p>the most appropriate way to proceed, as well as, your preferred method of establishing market share within the Industry.</p> <p>2. Do you feel that there are any items that the Working Group should also consider when using a market share based approach in establishing a threshold?</p> <p>3. Provide any further comments about establishing a threshold, ways of implementing this, and any other comments relevant to this topic.</p>
British Gas	<p>1. We agree that current market share should form part of the solution for allocating available space to suppliers.</p> <p>2. No</p> <p>3. We would support a hybrid solution where</p> <ol style="list-style-type: none"> 1. A proportion of available space should be reserved for new entrants 2. A proportion of the available space should be shared on a market share basis 3. A proportion of the available space should be equally divided between all suppliers
EDF Energy	<p>The allocation of spare capacity should be in a fair and equitable manner. It would seem sensible to allocate the capacity based on market share at a point in time. This would need to be monitored by the DNO in order to ensure that the spare capacity is not breached.</p>
Electricity North West Limited	<p>1. The allocation to each supplier should be based on their market share within each GSP group. The customers considered within that market share being those currently within Profile Class 1-8. The allocation would apply for an infinite period until the supplier uses its quota or is advised of an increased quota by the distributor if this has become available or system changes have improved the number that can be accommodated. A percentage (5%) should be held back to allow for new entrants.</p>

	<p>2. No.</p> <p>3. We need to keep the monitoring as simple as possible. We propose the use of reports to monitor numbers by supplier on the specific LLFs that will be generated for this change proposal. This is in preference to the count of initial requests otherwise monitoring will be very difficult once we enter change of supplier processes (e.g. if a supplier requests an HH tariff and this then moves to another supplier who maintains the HH tariff, the count will be against the current supplier and not against the initial request).</p>
Northern Powergrid	The proposal to allocate spare capacity by market share could be seen as discriminatory and without knowing the volumes it may not be possible to assess if the chosen approach could be implemented in a fair manner.
NPower	<p>(Covers all questions)</p> <p>Capacity to do this varies considerably by DNO – ranging from minimal to circa 40k sites. For this reason, we believe the fairest way to allocate mpans should be done on <u>total national market share (at total supplier level, not supplier ID) of non-half hourly mpans</u>. This ensures that suppliers who have large market share a specific area are not unfairly benefiting or being penalised depending on whether or not the DNO has large or negligible capacity to provide this service.</p> <p>Capacity needs to be held back for new entrants and for non half hourly mpans which will become mandatory half hourly in the future.</p> <p>This capacity split should be determined at a point in time (say 31st March?) and should <u>not</u> be up for review at a later date. This ensures that suppliers all have a fair and equitable opportunity to do this, it is not on a 'first come first served' basis.</p> <p>The working group should agree and publish the methodology to be used, as well as defining a process for the DNOs to feed back to suppliers when they are approaching their capacity limits.</p>
SP Distribution/SP Manweb	In our response to the previous RFI we commented as follows:

	<p><i>"This clearly demonstrates the difficulties envisaged by implementation of this proposal. Any limitation or staged approach suggests that it is accepted that the intent of DCP 103 cannot be met for all affected customers and that the timescales, even just for migration activities do not look achievable."</i></p> <p>Our concerns in this regard remains. In addition we believe that any attempt to allocate spare capacity (as per the proposals outlined above) could be viewed as a barrier to entry into the HH market and as such a barrier to competition.</p>
<p>Scottish Retail</p> <p>Power</p> <p>Energy</p>	<p>DNOs should be considering increasing the available space on their billing systems rather than limiting the number of sites that can be moved to HH billing and Settlement. Again, if P272 is approved and all sites eventually migrate toward HH Settlement there will be a greater need for DNOs to support these sites.</p> <p>2. The concerns are around impacts to customer groups for example those with many sites nationwide could find themselves with differing outcomes. There doesn't appear to be a fair way other than waiting until space is unlimited and it seems unusual to push through a change which can't be fully implemented.</p> <p>3. SMART ready suppliers may perceive themselves at a disadvantage if their "market share" is small overall. Also, what would be the impact on existing Measurement Class E customers if any? Is space limited in only certain DNO areas? If so, will this unfairly impact certain regions where the host supplier has the greatest amount of SMART ready sites?</p> <p>It would be seen as anti competitive to limit the availability of measurement class E. Also, DNOs would have to consider how they would handle the situation of one supplier using up their allocation very quickly while another does not immediately change any customers. Would this availability be held indefinitely?</p> <p>It is assumed the market share will be calculated by supplier ID by individual distribution area. Is this correct? If so this could result in a considerable administrative burden for both suppliers and DNOs. Would the volume be recalculated every year to accommodate customer transfers?</p>

SSE Energy Supply	<p>We believe that the restricted capacity situation should be avoided by using Option 4 (within the original RFI).</p> <p>Market Share should not be used to allocate available space, as market share is dynamic, yet system capacity is fixed. This would be a serious disadvantage to small suppliers.</p>
SSE power Distribution	<p>1. The Working Group reviewed the RFI responses and agreed that the fairest way to allocate this available space would be by current market share, whilst reserving an agreed amount for new entrants to the market. Provide comments on whether you agree that this is the most appropriate way to proceed, as well as, your preferred method of establishing market share within the Industry.</p> <p>This proposal is not consistent with the competitive market arrangements which reflect equality of (unlimited) access to all Suppliers or DCUSA Charging Objectives.</p> <p>2. Do you feel that there are any items that the Working Group should also consider when using a market share based approach in establishing a threshold?</p> <p>Thresholds are simply not appropriate - see above.</p> <p>3. Provide any further comments about establishing a threshold, ways of implementing this, and any other comments relevant to this topic.</p>

	See above.
The Electricity Network Company Limited	<p>1. The Working Group reviewed the RFI responses and agreed that the fairest way to allocate this available space would be by current market share, whilst reserving an agreed amount for new entrants to the market. Provide comments on whether you agree that this is the most appropriate way to proceed, as well as, your preferred method of establishing market share within the Industry.</p> <p><i>We would have difficulty in agreeing to a solution which could have the effect of unduly discriminating against customers and or suppliers. We do not think that the safeguards suggested are sufficiently robust.</i></p> <p>2. Do you feel that there are any items that the Working Group should also consider when using a market share based approach in establishing a threshold?</p> <p><i>The market share approach presents us with a number of issues.</i></p> <p>3. Provide any further comments about establishing a threshold, ways of implementing this, and any other comments relevant to this topic.</p> <p><i>One approach might be to apply a floor and ceiling on consumption patterns in determining eligibility.</i></p>
Western Power Distribution	We believe that a proportion of each DNO's spare capacity should be divided up by market share, a proportion should be held back for new entrants, and a proportion should be held back for first movers, allowing the suppliers who want to roll this out quickly to go ahead without suppliers who have no intention of engaging with the

	provisions of DCP103 inadvertently hogging capacity. We would suggest 50%, 5% and 45% respectively.
Question Eight	<p>The Working Group recognises that if DCP 103 is implemented, the current NHH tariffs will be mirrored in the HH market and this will affect the current elective HH settled Customers. Please provide supporting comments to each of the following questions:</p> <ol style="list-style-type: none"> 1. Please provide an impact assessment to identify any of your current Customers that would be affected by this change, and whether they would benefit or be disadvantaged by the change in tariff. 2. Please describe any mitigation measures you would need to employ in order to offset the effects of this on the current elective HH settled Customers. 3. Provide your opinion on whether this would require a renegotiation of their current contracts.
British Gas	We do not believe that the contract between a customer and a supplier should be within the scope of this CP.
EDF Energy	1. We expect 68 of our customers to be impacted by this change. Carrying out a quick impact assessment, we feel that some customers may actually benefit from this change.
Electricity North West Limited	We are taking this question to be focussed on the supplier community. That said, there will be an impact on those customers who have a high load factor (PC8) and are enjoying better prices on the current HH tariffs than those on a profiled tariff. These vary by distribution region and by profiled tariff.
Northern Powergrid	This proposal introduces an issue for those sites who had moved to elective HH in the past. The change will mean that suppliers will have to request a change for LLFC for these sites to make sure they are billed the same. Which may dis-advantage some

	customers and whilst these may be small in numbers the individual impact could be significant. Suppliers may need to rep-negotiate contracts with these customers.				
Npower	This is an area we will need to look at in more detail.				
SP Distribution/SP Manweb	Currently, within the SPD and SPM network areas there are a number of customers who are elective HH (Measurement Class E) customers. These customers may opt to move to the new 'mimicked' NHH DUoS tariffs in the HH market resulting in the possibility of reduced DUoS income going forward.				
Scottish Power Energy Retail	n/a				
SSE Energy Supply	<ol style="list-style-type: none"> 1. None currently affected. 2. None. 3. Should we have had any, we don't believe it would require a change in their contact arrangements, as any changes to the DUoS Pass Through charge would be reflected within the supply bill, thus providing them a financial benefit. 				
SSE Power Distribution	The questions in this area require further consideration, beyond the deadline for this consultation.				
The Electricity Network Company Limited	<p>The Working Group recognises that if DCP 103 is implemented, the current NHH tariffs will be mirrored in the HH market and this will affect the current elective HH settled Customers. Please provide supporting comments to each of the following questions:</p> <p>4. Please provide an impact assessment to identify any of your current Customers that would be affected by this change, and whether they would benefit or be disadvantaged by the change in tariff.</p> <p><i>Currently ENC has the Following Energised MPANS:</i></p> <table> <thead> <tr> <th><u>Profile Class</u></th><th><u>MPAN Count</u></th></tr> </thead> <tbody> <tr> <td>1</td><td>21863</td></tr> </tbody> </table>	<u>Profile Class</u>	<u>MPAN Count</u>	1	21863
<u>Profile Class</u>	<u>MPAN Count</u>				
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	<p>2 2533</p> <p>3 847</p> <p>4 48</p> <p>5 7</p> <p>6 38</p> <p>8 93</p> <p><i>Totalling 25,429 MPANs</i></p> <p>5. Please describe any mitigation measures you would need to employ in order to offset the effects of this on the current elective HH settled Customers.</p> <p><i>From a distributor view point, we presume that the new tariffs for HH customers would be of choice for SME customers. Therefore, a customer would only change from current tariff if there was a benefit.</i></p> <p>6. Provide your opinion on whether this would require a renegotiation of their current contracts.</p> <p><i>For suppliers to answer.</i></p>
Western Power Distribution	We feel suppliers are better placed to answer this question.
Question Nine	Do you think unmetered supplies should be included within the implementation of DCP 103? Please provide supporting comments.
British Gas	No – they do not have a meter.
EDF Energy	If unmetered supplies decided to move onto pseudo half hourly metering then there is already a suitable tariff for them to be charged on.

Electricity North West Limited	No. The intent is clear that it is to benefit from installing HH meters. No such meters would be installed in unmetered supplies.
Northern Powergrid	To meet the intent they would have to be included, however consideration needs to be given to the impact as unmetered supplies have different characteristics to other groups of customers.
NPower	We think UMS should be included in the scope of DCP103.
SP Distribution/SP Manweb	We do not support the inclusion of unmetered supplies in the implementation of DCP103.
Scottish Power Energy Retail	The pricing structure for Unmetered Supplies should not be treated differently. The majority of the UMS market is currently settled NHH but the group should consider potential tariff changes that can be progressed under DCP103 so HH UM can be supported in the future.
SSE Energy Supply	No. It is not practical to install pseudo HH metering equipment for all the areas that now use NHH trading.
SSE Power Distribution	No. The priority, if any, should be PC 5-8 customers.
The Electricity Network Company Limited	<i>It is worthy of considering but we would like to see more information on this.</i>
Western Power Distribution	We do not believe UMS should be included, as if they have half-hourly capable metering installed then they are no longer UMS. The current UMS solution is set up to deal with pseudo-half hourly profiled data and this would be a peculiar thing to change.
Question 10	Provide comments on the example LC14 Statement that is attached as Appendix.
British Gas	This looks fine as an example, however we note the potential interaction with the ongoing review of the statement of charges by another working group which may have implications on this.
EDF Energy	It seems appropriate to include the additional LLFC and PC into the NHH tables.

Electricity Limited	North West	<p>This is not fit for purpose. We do not support Unrestricted HH tariffs. It is not cost reflective.</p> <p>It also needs to cover off all PC5-8 HH tariffs and LDNO HH tariffs.</p> <p>The time bands should be provided in the LC14 statement for night and day as a generic statement.</p> <p>In our opinion this development work needs to be completed and put on the shelf in case DCP103 is approved. There would be no time to do so post determination in order to meet the final price deadlines. We need to agree how best to drive this forward to gain and industry approved document template.</p>
Northern Powergrid		The LC 14 statement can be amended to address the changes.
Npower		The LC14 should show the time bands that will be allocated to the equivalent half hourly mpan.
SP Distribution/SP Manweb		Whilst we believe the example LC14 Statement meets the requirements of the Change Proposal, we would ask the Working Group to note the Mini Consultation on the format of the Statement and the changes proposed therein.
Scottish Retail	Power Energy	<p>How is the cost signal on time of day use to be passed on if it is a simple p/MPAN/day?</p> <p>How is SSC relevant if trading HH?</p> <p>To avoid confusion we would expect a separate table for Measurement Class E.</p>
SSE Energy Supply		N/A
SSE Power Distribution		<i>(No comments provided)</i>
The Electricity Network Company Limited		<i>The way the example is structured it does not reflect the way in which we use LLFCs in our business i.e. we use a separate tariff code to define tariffs.</i>
Western Power Distribution		The statement is fine from our point of view, provided suppliers are happy with it.

Question 11	In regard to IDNO HH billing, please provide your preference as to whether you would like to continue to receive DNO/IDNO billing, or whether it would be preferable to receive two separate bills, one for HH and one for elective HH. Provide supporting comments.
British Gas	N/A
EDF Energy	We would prefer to receive two separate bills, one for HH and one for elective HH. This is required for us to allocate the costs in the line with the structure of the Business.
Electricity North West Limited	<p>Observation on the question - You do not receive bills your receive reports that the bills will be based on.</p> <p>In our opinion it makes no difference whether this is one or two reports as far as we are concerned since the LLFC will determine what set of charges we will be using to bill the IDNO.</p>
Northern Powergrid	N/A
Npower	We would prefer one invoice.
SP Distribution & SP Manweb	<p>While this question is directed at IDNOs as receivers of DUoS Invoices for HH Sites, it is just as relevant to consider from the Invoice creation side (i.e. the DUoS Billing IDNO or DNO). At present we receive a spreadsheet containing relevant extracts of D036 data values for all the HH sites within that IDNO Portfolio. Clearly this file could increase significantly under the present proposals. At present we have no technical functionality to identify "elective HH" separately then deliver separate methodology of charging for these. As stated elsewhere the introduction of a full "copy" domestic tariff set within HH category is neither the most preferred solution nor any more achievable within the very tight deadlines proposed.</p> <p>We strongly recommend that the methodology of DUoS Billing for domestic customers should NOT fall under the existing methodology for "normal" HH Site Billing. There is nothing to stop the categorisation remaining under the present arrangements with the DUoS Billing continuing to be produced from the proven Supercustomer Aggregated D0030's methodology with the aggregations then being based on accurate readings</p>

	rather than the previous aggregations of estimated profiles. This view appears to be strongly supported across Suppliers and Distributors, but does not appear to be getting due consideration within this DCP 103.
Scottish Power Energy Retail	Do not understand the question.
SSE Energy Supply	N/A
SSE Power Distribution	The questions in this area require further consideration, beyond the deadline for this consultation.
The Electricity Network Company Limited	<i>Separate bills would be the correct course of action as this would enable us as a company to better monitor these customers.</i>
Western Power Distribution	We would prefer one bill for both MC C and MC E customers as this will reduce processing time,
Question 12	Are there any unforeseen issues that haven't been addressed?
British Gas	N/A
EDF Energy	Not to our knowledge.
Electricity North West Limited	<p>Most of the discussions to date have focussed on the capability of distributors to undertake changes to the systems, processes and tariffs to accommodate this change proposal.</p> <p>It would be helpful to understand whether there are any supplier issues that need to be resolved and also whether there is a bow wave of requests for measurement class changes on the 1st April 2012 if the proposal is successful.</p> <p>The type of queries we are thinking of are:</p> <ul style="list-style-type: none"> • We still need to understand whether the new meters installed can provide the data required on the D0268 data flow format?

	<ul style="list-style-type: none"> Concern over accuracy of data that will be sent on the D0275 (D0036) has been identified in the cost benefit analysis for PC1-4 customers undertaken by Elexon. For domestic customers we may have many zero reads in an HH period. They are proposing three decimal points rather than one. Albeit we would not know until late in the day on whether this is supported or not it may be prudent to kick start the process by raising the necessary change request to the DTC so the impact will be minimised. It would be helpful to understand whether the supplier agents will be able to handle sending HH data and whether any work is required to obtain/poll the metering data.
Northern Powergrid	There seem to be more issues raised, as a result of the proposed implementation date. Many of these could be addressed if a longer timeframe was agreed however this cannot be achieved under this proposal.
Npower	<p>Current nhh sites that will become mandatory hh will need to be allocated capacity.</p> <p>When P272 is implemented, will these mpans need to be further migrated into that process?</p>
SP Distribution/SP Manweb	<p>Moving customers from NHH to HH may have an impact on Group Correction Factor given that it currently only applies to NHH market. We are concerned this change proposal may result in increased volatility.</p> <p>Where customers move from NHH to HH, there is no capacity to mimic any of the current NHH MTCs, as they currently have an MTC TPR count allocated against them (with the exception of common codes). In the HH market TPRs are not used because the data is gathered HH and as such switching times are not required.</p>
Scottish Power Energy Retail	<p>Although not directly related to DCP103, we would like to raise a few points for discussion:</p> <p>The treatment of special needs customers in the elective HH market. This flow can only be sent to NHH agents (particularly NHHDC). While we recognise the installation of a smart meter reduces the need to physically read the meter, occasions will happen when this is required and as such special needs information must be available.</p>

	<p>Impact on MPAS if bulk change of measurement class carried out.</p> <p>Emergency cover if DNO still provides cover for customers</p> <p>MOCOPA compliance – SMETS not current approved and current requirements do not match COP10 or COP05. Would this result in the onus being put on suppliers to apply for dispensation before carrying out the change of measurement class?</p> <p>Impact on Group Correction Factor – transferring large volumes of NHH customers could add volatility to GCF.</p> <p>The main concern surrounds the lack of readiness and the impact on measurement class E HH elective customers who may move to a supplier who doesn't have the systems, infrastructure or billing capacity to bill from HH data. The customers will be forced to stay with the SMART ready suppliers and competition will suffer as a result. Smaller suppliers will find it difficult to gain SMART customers as they will not be able to provide the same products and services</p>
SSE Energy Supply	<p>A rush to implement the changes by April 2012 may lead to mistakes being made.</p> <p>System capacity levels could be easily breached without warning, or contingency back-up plans.</p> <p>Domestic Smart Meters are measured in Watts, therefore there are serious concerns about the settlement accuracy of Smart Meters using a HH Mechanism for data collection (HHDC Flows: D0036 & D0275) where the accuracy is rounded to the nearest 100 Watts.</p> <p>This would either mean that Distribution Revenues will fall disproportionately, or will be overstated disproportionately. This would cause wider issues associated with Losses and Group Correction Factors.</p>
SSE Power Distribution	<i>(No comments provided)</i>
The Electricity Network Company Limited	<i>No further comment.</i>
Western Power Distribution	<p>It may be necessary to monitor the number of MC C to E changes suppliers are submitting in each DNO area to make sure suppliers are staying within allocated capacities. This should probably be done centrally with someone who has a view of all of these registrations rather than by each DNO individually.</p>

Question 13	Please state any other comments or views on the Change Proposal.
British Gas	N/A
EDF Energy	No other comments
Electricity North West Limited	None.
Northern Powergrid	<p>Our view is that that there is a danger of implementing a quick fix for April 2012 that could be at odds with a longer term solution. There is a potential discrimination issue for customers who are currently <100 kV but are traded HH as they would not have a choice of tariff, whereas the change suggests that suppliers could choose to trade domestic customers either NHH or HH simply by changing the measurement class.</p> <p>The timeframe also seems to be at odds with P272 which is suggesting mandatory changes for PC 5-8 by 2014 and PC1-4 as far away as 2020, with no bulk change of measurement class. In responses to P272 it was clear that site-specific billing for mass market customers was not the desired outcome, whereas this proposal would introduce site-specific billing, for as yet unknown volumes.</p> <p>Given that option 4 was thought by the working group to be the best solution it seems that option 1 creates more issues than it addresses, and more consideration should be given to deliver a solution that address future requirements.</p> <p>We do not believe the implementation date of April 2012 is achievable without unnecessary expenditure and disruption being introduced to deliver this short term fix.</p>
Npower	Our preference would have been PC5-8 only given that the D0275 only holds data to 1 decimal place. Migrating residential customers will therefore cause some disturbance in settlements due to rounding of data.
SP Distribution & SP	We would ask the working group to take into account the comments made in our

Manweb	previous response to the DCP 103 RFI.
Scottish Power Energy Retail	The working group has to consider a paper presented to SVG this month on Interaction between the SMETS and BSC CoP as currently any smart meters appear to be sitting in a CoP vacuum.
SSE Energy Supply	<ul style="list-style-type: none"> • The CP has set an implementation date of April 2012, and then chosen a solution to achieve that date. We think it would be wiser to choose the best long term solution and implement it as soon as circumstances permit. • DCUSA should take account of the responses to the Elexon P272 proposal, particularly in relation to Half Hourly settlement of profile 5-8 data. • If a customer is migrated to HH settlement on a date other than 1st April, the possibility of double charging of TNUoS arises. <p>The customer will pay NHH TNUoS on an ongoing basis before the migration occurs. He will then pay the full triad bill under the HH charging arrangements after he has been migrated. NGC would need to refund the NHH TNUoS payments, or agree some other form of compensation. An IT mechanism for the refund would need to be established.</p> <p>If we accept that the instantaneous transfer of all customers on a single date (1st April) is impractical, then a refund mechanism will be required. This point has been raised in the P 272 consultation, but no solution has been put forward (as far as I know).</p> <ul style="list-style-type: none"> • We stand by our comments made in the previous two RFIs
SSE Power Distribution	<p>We are of the view that this Change Proposal is premature and does not represent a fit-for-purpose, workable solution. If implemented, it would potentially result in chaotic delivery with different levels of transfers in different DNO areas, dependent on their varying billing capacity.</p> <p>We do not feel that it is reasonable to expect Distribution companies to ration or police</p>

	<p>allocations between Suppliers, particularly as this has questionable aspects associated with competition principles.</p> <p>There are serious questions to address in relation to the capability of billing systems (and the data handling systems behind them) to handle dramatic increases in volumes. Increased costs are inevitable.</p> <p>The industry should acknowledge and learn from previous situations where major changes have been made with undue haste, ahead of adequately robust systems to support them. This Proposal risks creating confusion and poor service, potentially to the discredit of the industry.</p> <p>The proposed implementation date is excessively ambitious and a more managed programme which fits with realistic delivery of appropriate and enduring processes, with equality of access to the market participants, is required.</p>
The Electricity Network Company Limited	<i>No further comment.</i>
Western Power Distribution	No further comments.